



The Parties have agreed to communicate about all additional class members and, if appropriate, add these additional individuals to the class and issue payments to them in accordance with the same formula the Parties used to calculate the settlement for the 211 original class members set forth in Paragraph 6 of the Consent Decree.

All other rights and obligations of the Parties, set forth in the Consent Decree, that have not been addressed in this Supplemental Consent Decree are incorporated herein by reference.

The undersigned counsel of record hereby consent to this Supplemental Consent Decree and further agree that it operates to supplement that which is contained in the Consent Decree. Together with the Consent Decree, this Supplemental Consent Decree constitutes the entire agreement and commitment of the Parties<sup>1</sup>. Any modifications to the Supplemental Consent Decree or the Consent Decree must be mutually agreed upon and memorialized in a separate writing signed by Defendant and the EEOC.

FOR PLAINTIFF:

/s/ Debra M. Lawrence  
Debra M. Lawrence  
Regional Attorney

/s/ Thomas D. Rethage, Jr.  
Thomas D. Rethage, Jr.  
Senior Trial Attorney  
EEOC PHILADELPHIA DISTRICT OFFICE

FOR DEFENDANT:

/s/ John M. Nolan  
John M. Nolan

/s/ Philip B. Rosen  
Philip B. Rosen

/s/ Francis P. Alvarez  
Francis P. Alvarez  
JACKSON LEWIS P.C.

Dated: November 21, 2018

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<sup>1</sup> This Supplemental Consent Decree does not extend the one-year period for which the Consent Decree is in effect.

**SO ORDERED.**

Signed and entered this \_\_\_\_ day of \_\_\_\_\_, 2018.

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Honorable John R. Padova  
United States Court District Judge